

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JASON MOLLETT,

Plaintiff,

Case No.: 3:20-CV-06168 RSM

V.

AEROTEK, INC., PINKERTON CONSULTING & INVESTIGATIONS, INC., ELLIS & ASSOCIATES INVESTIGATIONS LLC, PARK PLAZA LLC, EDWARD WAYNE RHOADS and ARLENE RHOADS, husband and wife, and their marital community, JOHN DOES 1-10, and ABC CORPORATIONS 1-10, unknown business entities.

**STIPULATED MOTION FOR
THE EXTENSION OF
DEADLINES**

Defendants.

STIPULATION

The parties to this action, by and through their undersigned counsel, request that the Court extend the initial disclosures deadlines set forth in the docket text on December 17, 2020. The parties have engaged in a limited amount of discovery while the case was pending in State Court. Plaintiff filed a Motion for Remand (Dkt. #25) which was noted for the Court's consideration on January 22, 2021. An extension may allow the parties to

1 avoid any unnecessarily duplicative discovery under the Federal Rules if a decision to
2 remand is granted. There has been one prior extension of the initial disclosure deadlines.
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4 IT IS SO STIPULATED
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6 RESPECTFULLY SUBMITTED this 12th day of February, 2021.
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8 DALTON LAW OFFICE PLLC
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CHOCK BARHOUM LLP
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13 *Attorneys for Plaintiff Jason Mollett*

14 By: /s/ Erica Deatherage
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20

21 By: /s/ S. Karen Bamberger
22 S. Karen Bamberger, WSBA No. 18478
23 *Attorneys for Defendant Pinkerton*

24 By: /s/ Scott T. Schauermann
25 Scott T. Schauermann
26 *Attorneys for Defendant Aerotek, Inc. &
Park Plaza*

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28 IN ACCORDANCE WITH THE STIPULATION OF THE PARTIES, the
29 Court ORDERS that the deadlines set in the Court's unnumbered, December 17, 2020
30 docket entry are hereby vacated and stricken pending a ruling on Plaintiff's motion for
31 remand. If necessary, the Court will reset deadlines at the appropriate time.
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33 DATED this 23rd day of February, 2021.
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37 RICARDO S. MARTINEZ
38 UNITED STATES DISTRICT JUDGE
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